

The Honorable Judge James L. Robart

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA

v.

SHAWNA REID,

Defendant.

NO. CR 19-117-JLR

NOTICE OF PRODUCTION OF
CERTAIN DISCOVERY PURSUANT
TO FED. R. CRIM. P. 16(a)(1)(B)(i)

The United States of America, by and through its counsel of record, David L. Jaffe, Chief of the Department of Justice Organized Crime and Gang Section, and Matthew K. Hoff, Trial Attorney, hereby provides notice to the Court of the government's production, pursuant to Fed. R. Crim. P. 16(a)(1)(B)(i) and Local Rule, W.D. Wash. CrR 16(a)(2), of recorded calls, commonly referred to as "jail calls," in which defendant Shawna Reid ("the Defendant") was a participant. On November 8, 2019, in a sealed order, the Court authorized the government to postpone its production of the recorded conversations between the Defendant and Richard Reid, Jr. until no later than one month before trial is set to commence, or in advance of any agreement between the Defendant and the government by which the Defendant agrees to plead guilty to one or both counts in the indictment or to related charges, except that, in the event that the government learns from any such recorded telephone call information that must be disclosed under *Brady v. Maryland*, 373 U.S. 83 (1963).

The government no longer sees the need to delay production of these statements any further, particularly because Richard Reid, Jr. is no longer incarcerated. Thus, the

1 government hereby provides notice of its production of the recorded statements of the
2 Defendant that were the subject of the Court's November 8, 2019 Order.

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4 DATED this 14th day of July 2020.

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6 Respectfully submitted,

7 DAVID L. JAFFE
8 Chief, Organized Crime and Gang Section
9 United States Department of Justice

10 MATTHEW K. HOFF
11 Trial Attorney
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15 District Court Judge James L. Robart
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